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**ADDENDUM NO. 7****Work Plan – Removal of Asbestos and Vermiculite  
at the Export Plant, Libby Asbestos Site  
28 July 2000**

This addendum to the 28 July 2000 Work Plan for the removal of asbestos and vermiculite at the Libby Asbestos Site is issued to amend the sequence of performing cleaning activities for the warehouse, while maintaining the safety of the public and contractor personnel.

On 20 September 2000, the EPA and WR Grace reached an agreement that cleaning of the warehouse may be initiated prior to full site enclosure and movement of Millwork West retail operation, providing that it will be prepared as an isolated and restricted zone from all other parts of the property and public use and access. This enables an early start on the cleaning of the warehouse in an effort to complete building cleanup before severe winter weather.

URS proposes to accomplish this in strict adherence to the Work Plan Health and Safety procedures, Air Monitoring procedures and documentation reporting to assure the EPA that the early start in cleaning operations were performed in a manner protecting the public and allowing Millwork West to continue other site operations until relocated to the new temporary pole barn structures (Section 2.1.6 of the Work Plan) off Highway 2 scheduled for completion on 30 September 2000.

To accomplish the cleaning, URS and its subcontractors ACandS and Koch Environmental Health, Inc. (KEH) will isolate the warehouse from all other site areas and activities by installing critical barriers at all openings of the warehouse per the building cleanup/decontamination procedures (Appendix D, Section 3.5). The personnel decontamination unit (Appendix D, Section 2.1) will be constructed and personnel access and egress will be restricted to this one entrance. Street clothes will be doffed and donned in the clean room.

The building exterior walls will become the boundary of an isolated restricted zone in the central portion of the site (Figure 2.1). This will not restrict Millwork West's utilization of access roads or other property areas. The necessary exterior work will be accomplished as follows:

1. After 5:00 p.m. on the day(s) approved by the EPA, URS and ACandS employees, in full PPE including respirators and Tyvek®, will hand shovel and grub the warehouse

foundation as needed for installation of a membrane to collect power wash overspray. The soil next to the warehouse foundation will be thoroughly wet to minimize dust prior to hand digging. The exterior elevator and pit inside the fenced area will be inspected and cleaned after hours also.

2. Bagged asbestos impacted materials, including used PPE, will be removed from inside the warehouse and staged in the bed of a 12-cubic yard dump truck parked on the west side of the property and covered with a tarp until approved for disposal at the mine.

In accordance with Appendix A (Sampling and Analysis Plan), KEH will implement for the warehouse cleanup operations, appropriate removal area and monitoring point (i.e., clean rooms, exhaust fans, etc.) sampling activities. ACandS and KEH will also monitor personnel per the Health and Safety Plan.

Upon completion of cleaning, all critical barriers will be left in place and the negative air machines (Appendix D, Section 3.7) will be left in operation. Final clearance sampling will not be conducted (Appendix A, Section 2.3) until after exterior soils in the immediate area are removed and the EPA agrees that exterior operations should not result in recontamination with asbestos or vermiculite particles.

All materials removed will be bagged and/or contained in sealed containers per Appendix D and left on site for later removal after set-up of the full site exclusion zone. At that time per all other applicable procedures of the Work Plan, transportation for disposal would begin.

This early start on the warehouse enables WR Grace to proceed rapidly with work activities, assuring completion per the revised schedule limits, not adversely affecting the Millwork West retail business, and protects the health and safety of the public, agency, or contractor personnel.

Activities initiating containment will begin as soon as possible. Complete cleaning of warehouse internals is scheduled for 14 October 2000.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Printed Name of Signer

Addendum No. 4 to the Work Plan for  
Removal of Asbestos and Vermiculite at the  
Libby Asbestos Site

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22 September 2000  
805169



19 June 2000

Mr. Paul Peronard  
USEPA  
EPR-SA  
999 18<sup>th</sup> Street, Suite 500

Mr. Paul Peronard  
EPA On-Site Coordinator  
USEPA  
501 Mineral Avenue  
Libby, Montana 59923

**RE: WR Grace and Company, Libby, Montana**

Dear Mr. Peronard:

In response to your request for notification of additional subcontractors, this is to inform you that we have selected J. Virginia Messick, MAI to do the property appraisal in Libby, Montana.

We have selected Kootenai Surveyors to do the survey task.

Please contact me if you have any questions.

Sincerely,

**URS Radian**

A handwritten signature in black ink, appearing to read "Jim Stout".

Jim Stout  
Project Manager

KP/nm

cc: File